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October 19, 2020


Time for all defendants to answer is set for November 30, 2020. Conference adjourned from November 10, 2020 to December 21, 2020 at 11:30 a.m.

SO ORDERED.

Dated: 10/20/2020

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
Courtroom 11D
500 Pearl Street
New York, New York 10007


P. Kevin Castel
United States District Judge

Bank Hapoalim B.M. v. Johnny Sajnani a/k/a Deepak Sajnani et. al.

Case No. 1:20-cv-07355-PKC

**Request for Uniform Date for Defendants to Respond to Complaint and
Adjournment of Case Management Conference**

Dear Judge Castel:

We are counsel to plaintiff Bank Hapoalim B.M. in this action. We are writing with the consent of Dwight Yellen, Esq., counsel for defendants, to request the Court to approve the agreement of counsel to set a uniform date for all Defendants to respond to the Amended Complaint to and including November 30, 2020 and for an adjournment of a Case Management Conference scheduled for November 10, 2020 until a date at least 14 days after November 30.

Defendants J&V Brand Management Co., LLC, Mercantile Credit, Inc., Johnny Signature Int Inc. and Johnny's Signature, Inc. ("Corporate Defendants") were served through the New York Secretary of State, with their answers due on October 29, 2020. Defendant Johnny Sajnani a/k/a Deepak Sajnani ("Sajnani") agreed to waive service pursuant to Fed. R. Civ. P. 4(d)(1), with his answer due on December 15, 2020.

To streamline the pleadings and place the Corporate Defendants and Sajnani, who share the same counsel, on equal footing, counsel for the parties have conferred and agreed, subject to approval of the Court, to November 30, 2020 as the deadline for the time for all defendants to answer or otherwise respond to the Amended Complaint.

Based on the agreed upon date for issue to be joined, and subject to the Court's approval, counsel for the parties respectfully request the Case Management

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Conference scheduled for November 10, 2020 be adjourned to a date set by the Court after November 30, 2020.

This is the first request of this kind. This short adjournment will cause no substantial delay in litigation and we thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Stephen Ellman

cc: Dwight Yellen, Esq. by ECF

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